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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:

*Jaylynn Dean v. Uber Technologies,  
Inc., et al., No. 3:23-cv-06708*

DEFENDANTS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS  
SHOULD BE SEALED

Case No. 3:23-MD-3084-CRB

**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

Under Civil Local Rules 7-11 and 79-5(f), Defendants hereby move the Court to consider whether certain materials should be sealed. Defendants file these materials under seal because they have been produced and marked confidential or contain references to documents produced and marked confidential by Plaintiffs.

**Material To Be Filed Under Seal**

The materials to be filed under seal are certain exhibits in Support of Defendants' contemporaneously-filed Motion for Partial Summary Judgment. Defendants respectfully ask the Court to consider whether the following should be filed under seal:

Document	Description	Designating Party
<b>Exhibit 6 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Bruce Weiner dated September 26, 2025, marked as Confidential.	Plaintiffs
<b>Exhibit 9 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of transcript of July 22, 2025 deposition of Scott McLaughlin, marked as Highly Confidential – Attorneys' Eyes Only.	Plaintiffs
<b>Exhibit 10 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Tempe Police Department records Bates stamped as JDean-TempePD-000001-25 and marked as Confidential – Attorney Eyes Only	Plaintiffs
<b>Exhibit 20 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of expert report of Veronique Valliere dated September 26, 2025, marked as Confidential	Plaintiffs
<b>Exhibit 21 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)</b>	Excerpt of Appendix D of expert report of Lacey R. Keller dated September 26, 2025, marked as Confidential	Plaintiffs

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Daniel Cummings in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

DATED: November 10, 2025

Respectfully submitted,

By: /s/ Daniel Cummings  
DANIEL CUMMINGS

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